

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WILBERT COOLEY &)
KANDEE COOLEY,)
)
Plaintiffs,)
)
v.)
) CASE NO.: 06-215-BH-M
AMERIQUEST MORTGAGE COMPANY,)
a Delaware Corporation, HERITAGE)
TITLE, LLC, AND FICTITIOUS A - Z,)
inclusive,)
)
Defendants.)

JOINT MOTION TO STAY

COMES NOW the Plaintiffs, Wilbert and Kandee Cooley, (“Plaintiffs”), Defendant, Ameriquest Mortgage Company, (hereinafter “Ameriquest”), and Defendant Heritage Title, LLC, by and through the undersigned counsel and file this Joint Motion to Stay pending resolution of the conditional transfer to Multidistrict Litigation.

1. On or about June 30, 2006, the parties received notice of a conditional transfer of the above-styled matter to the Judicial Panel on Multidistrict Litigation. *See* Conditional Transfer Order attached as Exhibit A.

2. The above-styled matter is being transferred to MDL-1715—*In re Ameriquest Mortgage Co. Mortgage Lending Practices Litigation*.

3. According to the Scheduling Order in the above-styled matter, the Report of Parties Planning Meeting is due on July 10, 2006.

4. The parties respectfully request that this matter be stayed pending the resolution of the conditional transfer to Multidistrict Litigation.

Respectfully submitted,

/s/ April England Albright
April England Albright
Attorney for Plaintiffs

The Justice Group, Inc.
116 Mabry Street
Selma, Alabama 36701

/s/ Robert Huffaker
Robert Huffaker
Attorney for Heritage Title

Rushton Stakely Johnston & Garrett PA
P.O. Box 270
Montgomery, Alabama 36101

/s/ Robin L. Beardsley
Kaye K. Houser (HOU002)
Robin L. Beardsley (BEA066)
Attorneys for
Ameriquest Mortgage Company

SIROTE & PERMUTT, P.C.
2311 Highland Avenue South
Post Office Box 55727
Birmingham, AL 35255-5727
Tel.: (205) 930-5100
Fax: (205) 930-5335

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of July 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the counsel of record.

/s/ Robin Beardsley
Of Counsel